

**GIBBONS P.C.**

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*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

NEW ENGLAND MOTOR FREIGHT, INC.,  
*et al.*,<sup>1</sup>

Debtor.

Chapter 11

Case No. 19-12809 (JKS)

(Jointly Administered)

**FOURTH SUPPLEMENTAL CERTIFICATION OF KAREN A. GIANNELLI  
REGARDING THE EMPLOYMENT AND RETENTION OF GIBBONS P.C. AS  
GENERAL BANKRUPTCY COUNSEL TO THE DEBTORS**

Karen A. Giannelli, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney at law of the State of New Jersey and admitted to practice before this Court. I am a director of Gibbons P.C. (“**Gibbons**” or the “**Firm**”), which maintains offices in various locations, including One Gateway Center, Newark, New Jersey 07102.

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

2. This Fourth Supplemental Certification is submitted in connection with Gibbons March 13, 2019 retention as counsel for the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) nunc pro tunc to the petition date [ECF 239] for the purpose of providing supplemental disclosures required under sections 327(a), 328, 504 and 1107 of the Bankruptcy Code and FED. R. BANK. P. 2014(a). Except as otherwise set forth herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

### **ADDITIONAL DISCLOSURES**

3. As a supplement to the disclosures set forth in my prior Certifications [ECF 102-1; 204; 640; 974], I make the following statements:

4. In furtherance of our continuing review of disclosures in the Chapter 11 Cases, Gibbons notes that it has pre-existing and ongoing client relationships with Deloitte LLP and/or various of its affiliates (the “**Deloitte Affiliates**”) in the United States and internationally in matters unrelated to the Debtors.

5. Deloitte Consulting LLP (“**Deloitte**”) was retained by the Debtors by Order entered on August 17, 2019 [Doc. 806] to estimate incurred but not paid medical and dental claim liability.

6. The Firm does not believe that there is any conflict presented by the aforementioned client relationships with Deloitte but makes this disclosure out of an abundance of caution.

7. Except as updated herein, the remaining disclosures set forth in my prior Certifications are true and correct.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: November 14, 2019  
Newark, NJ

/s/ Karen A. Giannelli  
Karen A. Giannelli